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Marybeth M. Banks
Director
Government Affairs

April 16, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Ms. Dortch:

Sprint Nextel Corporation hereby submits its 2012 Annual Telephone Relay Services ("TRS") Report on the developments and progress made towards meeting certain requirements that are waived for IP Relay and Web CapTel services, as required by the Commission.¹ The waivers should remain in effect until the technological hurdles to meeting the mandatory minimum standards for the TRS features discussed herein are overcome.

Sprint Nextel is not submitting a report for Video Relay service, as it no longer provides this service.

If you have any questions concerning this report, please contact me.

Sincerely,

Marybeth M. Banks

Attachment

Cc: Karen Peltz Strauss, Deputy Bureau Chief,
Consumer and Government Affairs Bureau

Gregory Hlibok, Chief, Disability Rights Office

¹ *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, CG Docket No. 03-123, 19 FCC Rcd 12475 (rel. June 30, 2004).*

**FCC IP Relay Service Annual Progress Report
April 16, 2012**

Waivers	IP Regulatory Status	IP Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
1. Types of Calls	Waived through 7/1/2012	Currently, IP Relay users are able to connect with Operator Assistance and place long distance calls at no charge to the customer. The limitation is that IP Relay providers do not have billing arrangements with long distance carriers.	The technical challenge remains of tying an exact location and billing of long distance or operator assisted calls. No additional development has been made that would allow IP Relay end users to be billed for these types of calls. Therefore, these calls are not billed to IP Relay users.
2. STS	Waived through 7/1/2012	As VOIP continues to develop over the internet infrastructure, the quality of these services continues to improve. However, at this time, technology is not universally available that will allow every user to experience high quality service. Sprint continues to monitor the situation and while there has been improvement, universal availability has not materialized.	This continues to be in the research and development stage. Sprint is investigating and evaluating VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.
3. Emergency Call Handling	Implemented on 12/31/08	Currently, registered Sprint IP relay users provide their location information into the Sprint Relay database. The database information is transmitted to the DASH Carrier Services database that provides the most appropriate emergency facility to process the emergency call. Callers are responsible for updating their location information in their user profile in the event of an emergency	Sprint IP relay has an agreement with a 9-1-1 service provider to provide the most appropriate PSAP by providing the registered user's location and IP address. Today, Sprint IP relay users have the ability to place 911 calls. Sprint IP relay users who are not registered or who are using their default provider are able to place 911 calls; however, those users must provide their location manually to the Relay Operator.
4. Pay-per-call (900) Service	Waived through 7/1/2012	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of the ANI location, and without an ANI to which the pay-per-call charges may be applied, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services.

**FCC IP Relay Service Annual Progress Report
April 16, 2012**

Waivers	IP Regulatory Status	IP Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
5. Voice Carry Over (VCO) (one-line)	Waived through 7/1/2012	As VOIP continues to develop over the internet infrastructure, the quality of these services continues to improve. At this time, however, technology is not universally available that will allow every user to experience high quality service. Sprint continues to monitor the situation and while there has been improvement, universal availability has not materialized.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.
6. Hearing Carry Over (HCO) (one-line)	Waived through 7/1/2012	As VOIP continues to develop over the internet infrastructure, the quality of these services continues to improve. At this time, technology is not universally available that will allow every user to experience high quality service. Sprint continues to monitor the situation and while there has been improvement, universal availability has not materialized.	Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.
7. VCO-to-TTY	Waived through 7/1/2012	As VOIP continues to develop over the internet infrastructure, quality of these services continues to improve. At this time, however, technology is not universally available that will allow every user to experience high quality service. Sprint continues to monitor the situation and while there has been improvement, universal availability has not materialized.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY or VCO, as communication between internet and baudot protocols are not compatible.
8. HCO-to-TTY	Waived through 7/1/2012	As VOIP continues to develop over the internet infrastructure, quality of these services continues to improve. At this time, however, technology is not universally available that will allow every user to experience high quality service. Sprint continues to monitor the situation and while there has been improvement, universal availability has not materialized.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY or HCO, as communication between internet and baudot protocols are not compatible.

**FCC IP Relay Service Annual Progress Report
April 16, 2012**

Waivers	IP Regulatory Status	IP Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
9. VCO-to-VCO	Waived through 7/1/2012	As explained in number 5 above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY or VCO, as communication between internet and baudot protocols are not compatible.
10. HCO-to-HCO	Waived through 7/1/2012	As explained in number 5 above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY or HCO, as communication between internet and baudot protocols are not compatible.
11. Call Release	Waived through 7/1/2012	An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature.
12. Speed Dialing	Waived through 04/30/2009 Implemented by Sprint on 12/31/08	Speed dialing is currently available to registered Sprint IP relay callers via a frequently dialed number option. Sprint IP callers can create a speed dial list and greatly improve the efficiency and connect time with the outbound party through the relay operator.	Sprint offers speed dial capabilities for its IP and IM callers.

**FCC Web CapTel Service Annual Progress Report
April 16, 2012**

Waivers	Regulatory Status	Web CapTel Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
1. Types of Calls	Waived through 7/1/10	It is technologically infeasible to bill for long distance calls and operator assisted calls as one segment of the call is transmitted via the internet.	In the interim, long distance calls are free of charge.
2. Emergency Call Handling		<p>Without ten digit number assignment, Relay Providers are unable to automatically ascertain the location of the caller or to automatically transfer 911 calls to an appropriate PSAP.</p> <p>Internet Protocol network (IP network) does not support the Automated Number Identification information. Without automated knowledge of the originated location of the call, Sprint is not in a position to transfer 911 calls to an appropriate PSAP.</p>	<p>Current options may restrict interoperability. Relay agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates or may be registered with another relay provider.</p> <p>Sprint currently requests location information and performs a manual process for obtaining the administrative telephone number of an appropriate PSAP.</p> <p>Over the last four years, Sprint has worked with industry groups to determine appropriate numbering assignment to aid in 911 call processing.</p>
3. Pay-per-call (900) Service	Waived through 7/1/2012	IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls.	The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow WebCapTel and Wireless CapTel end users to be billed for pay-per-call services.

**FCC Web CapTel Service Annual Progress Report
April 15, 2012**

Waivers	Regulatory Status	Web CapTel Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
4. Voice Carry Over (VCO) (one-line)	Waived through 7/1/2012	<p>Voice over IP (VoIP) requires Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dissimilar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p>	In research and development stage. Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support One-line Voice Carry Over (VCO); Sprint is also investigating LAN/WAN systems where QoS can be controlled internally.
5. Hearing Carry Over (HCO) (one-line)	Waived through 7/1/2012	As explained in number 4 above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Captioned Telephone Service is not designed to connect an inbound internet caller with the called party who uses HCO. Communication between internet and baudot protocols is not compatible.
6. VCO-to-TTY	Waived through 7/1/2012	As explained in number 4 above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Captioned Telephone Service is not designed to connect an inbound internet caller with the called party who uses TTY or VCO. Communication between internet and baudot protocols is not compatible.
7. HCO-to-TTY	Waived through 7/1/2012	As explained in number 4 above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Captioned Telephone Service is not designed to connect an inbound internet caller with the called party who uses TTY or HCO. Communication between internet and baudot protocols is not compatible.

**FCC Web CapTel Service Annual Progress Report
April 15, 2012**

Waivers	Regulatory Status	Web CapTel Current Technology Issues/Limitations	Progress and steps taken to meet the requirement
8. VCO- to-VCO	Waived through 7/1/2012	As explained in number 4 above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Captioned Telephone Service is not designed to connect an inbound internet caller with the called party who uses TTY or VCO. Communication between internet and baudot protocols is not compatible.
9. HCO-to-HCO	Waived through 7/1/2012	As explained in number 4 above, voice quality over the internet is not universally effective at this time.	Sprint's Internet Captioned Telephone Service is not designed to connect an inbound internet caller with the called party who uses TTY or HCO. Communication between internet and baudot protocols is not compatible.
10. Call Release	Waived through 7/1/2012	An Internet Captioned Telephone caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible.	It is not technically feasible at this time to provide call release features with Internet Captioned Telephone Service calls. However, Sprint will continue to investigate new developments to allow Internet Captioned Telephone Service customers to use this feature.
11. Speed Dialing	Implemented	Sprint's Captioned Telephone platform provides speed dialing either from the Captioned Telephone device itself, or via the user's interface on Web CapTel. All current Captioned Telephone products have speed dial capabilities.	